

PAUL, WEISS, RIFKIND, WHARTON & GARRISON LLP

1285 AVENUE OF THE AMERICAS  
NEW YORK, NEW YORK 10019-6064  
TELEPHONE (212) 373-3000

DIRECT DIAL: (212) 373-3163  
EMAIL: JAYCOHEN@PAULWEISS.COM

|             |                |
|-------------|----------------|
| BEIJING     | SAN FRANCISCO  |
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December 4, 2024

**VIA ECF AND EMAIL**

The Honorable Katharine H. Parker  
United States District Court  
Southern District of New York  
Daniel Patrick Moynihan Courthouse  
500 Pearl Street, New York, NY 10007

*Mechanical Licensing Collective v. Spotify USA Inc.*, No. 1:24-cv-03809

Dear Judge Parker:

In accordance with Your Honor's Order dated November 20, 2024 (Dkt. 49), the parties in the above-captioned action write jointly to propose the following amended schedule for remaining discovery.

After conferring, the parties agree that the following proposed amended schedule should afford sufficient time to resolve any outstanding discovery disputes, collect, review and produce responsive documents, conduct depositions, and conduct third-party discovery:

| <b><u>Discovery Event</u></b> | <b><u>Current Deadline</u></b> | <b><u>Proposed New Deadline</u></b> |
|-------------------------------|--------------------------------|-------------------------------------|
| Interrogatory Responses Due   | December 4, 2024               | December 11, 2024                   |
| Requests for Admission Due    | December 6, 2024               | February 28, 2025                   |
| Close of Fact Discovery       | December 31, 2024              | March 31, 2025                      |
| Initial Expert Reports Due    | January 14, 2025               | April 21, 2025                      |
| Rebuttal Reports Due          | February 4, 2025               | May 16, 2025                        |
| Close of Expert Discovery     | February 14, 2025              | June 6, 2025                        |

This is the second request for an extension of time to complete discovery.

Thank you for your time and consideration of this request.

PAUL, WEISS, RIFKIND, WHARTON & GARRISON LLP

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Respectfully submitted,

**PAUL, WEISS, RIFKIND, WHARTON &  
GARRISON LLP**

/s/ Jay Cohen

Jay Cohen

Darren W. Johnson

1285 Avenue of the Americas

New York, NY 10019-6064

Telephone: (212) 373-3000

jaycohen@paulweiss.com

djohnson@paulweiss.com

*Attorneys for Plaintiff Mechanical Licensing  
Collective*

**LATHAM & WATKINS LLP**

/s/ Allison Levine Stillman

Allison Levine Stillman

1271 Avenue of the Americas

New York, NY 10020

Telephone: 212-906-1200

alli.stillman@lw.com

Sy Damle

555 Eleventh Street NW

Suite 1000

Washington, DC 20004

Telephone: 202-637 2200

sy.damle@lw.com

*Attorneys for Defendant Spotify USA, Inc.*